

EXHIBIT H

Heldman, Alexander

From: Heldman, Alexander
Sent: Friday, October 25, 2024 8:09 PM
To: Baker, Michael
Cc: Takashima, Edward; 1045-BC Amazon Paralegal-DL; michael.jo@ag.ny.gov; Smith Tim; rahul.darwar@ct.gov; Field, Victoria; DeWilde, Kristen; Trefz, Katherine; rkeeling@redgravellp.com; 'Mitchell-Tombras, Katharine'; 'molly.terwilliger@morganlewis.com'; Butler, Amanda; Hodges, Kevin
Subject: FTC et al v. Amazon, No. 23-cv-1495 - Custodial Document Numbers

Hi Mike,

Please find below the total number of docs for each custodian for which we lack email. Thank you for your patience—verifying these numbers and ensuring their accuracy proved far more difficult than we anticipated.

Two notes about these numbers:

- For many of these custodians, these counts are underinclusive because no number below includes SharePoint files, even though we confirm we collected Sharepoint files for all custodians listed except Max Morris and Manmeet Dhody, who do not have SharePoint files available for collection. SharePoint is one of the sources available for many of the below custodians, so some totals are likely much lower than if SharePoint had been included. We understand that due to the nature of how SharePoint works—in that several custodians can access the same files, resulting in many duplicates—it is incredibly difficult to reverse engineer the number of SharePoint files associated with a given custodian in our database. We are working with our vendor to find a solution, and will update the below totals if we find one
- These numbers only reflect the files collected directly from a given custodian. It does not include documents pulled from *other* custodians that the below custodians are nevertheless on. Thus, the number of files in our database that can be attributed to a given custodian are often larger—and for some, orders of magnitude larger—than the numbers reflected below. We can also provide those additional metrics if needed.

Custodian	Document Totals
	6,572
	9,593
	31,944
	3,140
	3,639
	52,086
	13,628
	12,675
	6,270
	2,799
	13,425
	73,726

	129,932
	164
	8,296
	103,884
	6,723
	2,609
	2,902
	1,433
	570
	32,098
	3,957
	3,398
	3,438
	1,530
	2,676
	7,322

Finally, though the parties have not yet agreed to [REDACTED] inclusion as a custodian, Amazon has determined that it has no emails (or Sharepoint files) for him. It has 27,303 other files in his custodial file. Please let us know if this information affects Plaintiffs' custodial trade offer.

Thanks,
Alex

Alex Heldman
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